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December 11, 2024

VIA EMAIL

The Honorable Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower
18th Floor
Philadelphia, PA 19103

RE: Documents Requested by Plaintiffs in Advance of Dr. Lin's Deposition

Dear Judge Vanaskie:

As requested during the case management conference on December 4, 2024, I am writing with an update regarding Plaintiffs' request for documents in advance of Dr. Jinsheng Lin's deposition. The parties engaged in a productive meet-and-confer on Friday, December 6 to discuss the scope of the request and timing of production. ZHP produced a sample of the documents requested by Plaintiffs yesterday. Plaintiffs are reviewing the documents, which are Chinese language documents. The parties have agreed to further meet and confer within the next week with regard to the initial production and potentially further productions.

Very truly yours,



Jessica Davidson